

MULLIN HOARD & BROWN, L.L.P.
Steven L. Hoard, SBN: 09736600
P.O. Box 31656
Amarillo, Texas 79120-1656
Telephone: (806) 372-5050
Facsimile: (806) 372-5086
shoard@mhba.com

Counsel for Curtis Jones Farms; Don Jones Farm, Inc.; Don Jones Trucking, Inc.; and Kinsey Jones

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

IN RE: McCLAIN FEED YARD, INC., McCLAIN FARMS, INC., AND 7M CATTLE FEEDERS, INC., Debtors. ¹	Chapter 7 CASE NO. 23-20084-rlj Jointly Administered
RABO AGRIFINANCE LLC, <i>Plaintiff,</i> v. ACEY LIVESTOCK, LLC, et al. <i>Defendants.</i>	ADV. PROC. NO. 23-02005-rlj Honorable Robert L. Jones

DEFENDANTS CURTIS JONES FARMS, DON JONES FARM, INC., DON JONES TRUCKING, INC., AND KINSEY JONES' ORIGINAL ANSWER TO PLAINTIFF RABO AGRIFINANCE LLC'S COMPLAINT FOR DECLARATORY RELIEF

TO THE HONORABLE ROBERT L. JONES, U.S. Bankruptcy Judge:

Defendants Curtis Jones Farms, Don Jones Farm, Inc., Don Jones Trucking, Inc., and Kinsey Jones (collectively, the "Defendants") hereby file their answer to the Complaint filed by Plaintiff, Rabo Agrifinance LLC ("RAF"), and state:

¹ The Debtors in these jointly administered cases are: (1) McClain Feed Yard, Inc. (Case No. 23-20084); (2) McClain Farms, Inc. (Case No. 23-20885); and (3) 7M Cattle Feeders, Inc. (Case No. 23-20886). All three cases are being jointly administered under the case number for McClain Feed Yard, Inc.

JURISDICTION, VENUE, AND PARTIES

1. Admitted.

2. Admitted.

3. Admitted.

4. Admitted.

5. Admitted.

6. Admitted.

7. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

8. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

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138. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

139. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

140. No admission or denial is required as to this paragraph.

GENERAL ALLEGATIONS

141. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

142. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

143. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

144. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

145. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

146. Defendants admit that McClain engaged in a multi-million dollar Ponzi and check kiting scheme, but otherwise deny the allegations in this paragraph.

147. Admitted.

148. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

149. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

150. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

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156. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

157. Admitted.

158. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

159. Admitted.

160. Admitted.

161. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

162. Denied.

163. Denied.

164. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

165. No admission or denial is required as to this paragraph.

166. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

167. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

168. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

169. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

170. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

171. Denied.

172. Denied.

173. Denied.

**FIRST CAUSE OF ACTION
(Declaratory Judgment)**

174. Defendants incorporate and reallege their responses to each of the paragraphs above, as if fully set forth herein.

175. Admitted.

176. Admitted.

177. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

178. Admitted.

179. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

180. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

181. Denied.

182. Denied.

183. Denied.

184. Denied.

185. Defendants incorporate and reallege their responses to each of the paragraphs above, as if fully set forth herein.

186. Admitted.

187. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

188. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

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192. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

193. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

194. Denied.

195. Denied.

196. Admitted.

197. Denied.

198. Denied.

199. Denied.

200. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

201. Denied.

202. Denied.

THIRD CAUSE OF ACTION (Declaratory Judgment)

203. Defendants incorporate and reallege their responses to each of the paragraphs above, as if fully set forth herein.

204. Admitted.

205. Admitted.

206. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

207. Defendants admit that the quoted statute says what it says. Otherwise, the allegations in this paragraph are denied.

208. Defendants admit that the quoted statute says what it says. Otherwise, the allegations in this paragraph are denied.

209. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

210. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

211. Defendants lack sufficient information either to admit or deny the allegations in this paragraph, and therefore deny the allegations.

212. Denied.

PRAYER FOR RELIEF

Defendants deny that RAF is entitled to the relief it seeks in this Complaint for Declaratory Relief and pray that RAF take nothing by this lawsuit. Defendants further pray that they be awarded their costs and reasonable attorneys' fees incurred herein.

DATED February 22, 2024.

Respectfully Submitted,
MULLIN HOARD & BROWN, L.L.P.
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/s/ Steven L. Hoard
Steven L. Hoard, SBN: 09736600
*Counsel for Curtis Jones Farms; Don Jones Farm, Inc.;
Don Jones Trucking, Inc.; and Kinsey Jones*

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Answer was served on all parties who have entered an appearance in this adversary proceeding via ECF on February 22, 2024.

/s/Steven L. Hoard
Steven L. Hoard